## **EXHIBIT D**

## USA V MICHAEL JACKSON

## COMPARISON OF FACTUAL BASIS IN PLEA AGREEMENTS

Event	Michael Jackson	Charles Eubanks	Martel Mullins
Englewood Beauty Supply 7/31/07	1) Jackson & Mullins armed with semiautomatic handguns & Eubanks had a plastic BB gun 2) Mullins pointed handgun at Clerk 3) Mullins demanded money from the cash register and Clerk gave Mullins \$600 cash 4) Jackson & Eubanks beat owner 5) Mullins forced Clerk to rear of store 6) Mullins took VCR 7) Robbers took Owner's wallet	1) Jackson & Mullins had real guns & Eubanks had plastic BB gun 2) Eubanks & Jackson pointed guns at owner of store; Mullins pointed his at a clerk 3) Mullins demanded money from cash register and Clerk gave him \$600 from cash register 4) Jackson & Eubanks beat owner 5) Mullins forced Clerk to rear of store 6) Mullins took VCR from store 7) Eubanks & Jackson took owner's wallet	This Robbery is not mentioned in the Plea Agreement

Event	Michael Jackson	Charles Eubanks	Michael Cooper
Soto's Jewelry 8/2/07	1) All had real firearms 2) Cooper & Eubanks hopped the counter and forced a Clerk to ground at gunpoint while Jackson stood guard with his firearm 3) Took a white necklace and four charms worth \$3,000 4) Eubanks dragged a second victim from rear to front of the store	1) Eubanks, Jackson & Cooper all had real firearms 2) Eubanks & Cooper hopped the counter and forced a clerk to the ground at gunpoint 3) Took white gold charm and four necklaces worth \$3,000 4) Eubanks dragged Clerk from back room to front room of the store	1) All had real firearms 2) Cooper & Eubanks hopped the counter and forced a Clerk to ground - Jackson stood guard with his firearm 3) Took a white gold necklace and four charms worth #3,000 4) Eubanks dragged a Clerk from back room to the front room

Event	Michael Jackson	Martel Mullins	Thomas Hawkins
West Side Food Mart 7/20/07	1) Mullins, Hawkins & Jackson 2) Jackson pointed semi-automatic firearm that Jackson had with him at Clerk's head forcing Clerk to the ground 3) Defendants took several hundred dollars from cash register 4) Mullins said we should kill the Clerks	1) Mullins, Hawkins & Jackson 2) Jackson pointed a semi- automatic handgun at Clerk's head forcing Clerk to the ground 3) Hawkins stood Guard inside the store 4) Jackson & Mullins took several hundred dollars in cash from cash register 5) Mullins said we should kill the Clerks	1) Mullins, Hawkins & Jackson 2) Jackson pointed a semi-automatic firearm that he had with him at one of the Clerk's heads forcing the Clerk to the ground 3) Hawkins stood guard inside the store 4) Jackson & Mullins took several hundred dollars in cash from the cash register 5) Mullins said we should kill the Clerks